

Jeroen Walstra - 12/15/03

1

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE DISTRICT OF MARYLAND

3 BRUCE ALLEN LILLER, et al

4 Plaintiffs

5 vs. #MJG 02-CV-3390

6 ROBERT KAUFFMAN

7 Defendants and  
8 Third Party Plaintiffs

9 vs.

10 ROGER LEE HELBIG

11 Third Party Defendant

12 /

13 The telephonic deposition of JEROEN  
14 WALSTRA was held on Monday, December 15, 2003,  
15 commencing at 2:00 p.m., at the Law Offices of Lord &  
16 Whip, 36 South Charles Street, 10th Floor, Baltimore,  
17 Maryland, 21201, before Paula J. Eliopoulos, Notary  
18 Public.

19

20

21 REPORTED BY: Paula J. Eliopoulos

EXHIBIT

tabbles®

C

Jeroen Walstra - 12/15/03

<p>1 A And then I have a <u>certificate of Dutch in</u>  2 <u>Dutch law in economics from the University of</u>  3 <u>F-U-T-R-E-C-H-T, 1988.</u>  4 Q What caused you to go from studying  5 physical education to economics?  6 A My -- actually my degree is in marketing.  7 Q Which degree is in marketing?  8 A The Master's Degree.  9 Q I understand. Okay.  10 From Webster University?  11 A Correct.  12 Q So, you hold a Master's Degree in  13 marketing?  14 A Yes.  15 Q Other than the certificate which you hold  16 in Dutch law in economics --  17 A I did what they called <u>post Masters</u>  18 <u>credit at Melhurst (phonetic) College in 1997, which</u>  19 <u>related to vocational economic analysis and testimony.</u>  20 And I have a -- I'm a certified earnings  21 analyst per July 18th, 2002, and that is through the</p>	<p>6  1 with respect to economics?  2 A No, I don't.  3 Q Would you give me, please, your employment  4 history beginning with 1990?  5 A 1990? I started working for 3-M Health  6 Care. That's what they call it. Marketing  7 coordinator for surgical products.  8 At the same time, I was adjunct professor  9 for Webster University in The Netherlands where they  10 had a campus and taught market forecasting.  11 And then I continued to work for 3-M until  12 1994 in the Netherlands in Europe.  13 And then I moved to the United States in  14 19 -- end of 1994, Christmas, 1994, to work for 3-M  15 International Business Development. There I worked as  16 a -- worked in planning for exporters and 3-M  17 subsidiaries.  18 Then I moved to the Pittsburgh area after  19 quitting my job at 3-M and became self-employment.  20 because I was already involved in some of the similar  21 activities that we had in terms of forecasting</p>
<p>7  1 professional association named AREA, and that's the  2 American Rehabilitation Economics Association.  3 Q And did you have to take an exam --  4 A Yes.  5 Q -- of some kind to obtain that  6 certification?  7 A Yes.  8 Q When did you take that exam?  9 A On July -- no. That must have been end of  10 May in 2002.  11 Q Is that a written exam?  12 A Yes. It's an eight-hour exam.  13 Q And is the examination administered by  14 the -- by AREA?  15 A Yes.  16 Q Did you pass that exam on your first  17 attempt?  18 A Yes.  19 Q Other than that certificate, which is a  20 certified earnings analyst, and your certificate in  21 Dutch law in economics, do you hold any other degrees</p>	<p>7  9  1 earnings through an insurance company, actually, in  2 The Netherlands originally.  3 And with my business partner, Charles  4 Cohen, I set up this consulting business, and we  5 started writing reports for attorneys in 1997  6 regarding losses of earnings in personal injury cases  7 and medical malpractice cases.  8 Q So, did you leave 3-M in 1997?  9 A Actually I left in 1996. In the meantime,  10 I did also work with the United Marketing Group, which  11 is a consulting -- small consulting firm.  12 And I sometimes still do things for them  13 on a free-lance basis.  14 Q What kind of work do you do for them?  15 A It's consulting with small businesses  16 looking at market forecasting, sales development,  17 market share development, that kind of stuff, whatever  18 comes in as a job.  19 Q So, just for my own edification, for  20 example, if a company were interested in getting into  21 a different line of business, they might come to you</p>

3 (Pages 6 to 9)

Jeroen Walstra - 12/15/03

<p>42</p> <p>1 weeks for another and once a month for a third year.  2 I did not include all the costs that he  3 describes. I did get a price for a neurological  4 assessment. I just look -- for Zoloft, I looked on  5 the Web site. I got a price from one of the people  6 that is doing that, a thousand dollars they charge for  7 that.</p> <p>8 And the follow-up treatment was based on  9 twelve visits at \$80 a year -- \$80 per visit. So,  10 that's basically for one year, and I discounted it  11 over three years.</p> <p>12 So, I think that the amount would be  13 higher than the amount that I have here.</p> <p>14 Q Wow! I've got so many questions about  15 that, I'm not sure where to start.</p> <p>16 Do you know if any physician has  17 prescribed any of these treatments or services for  18 Michael Liller?</p> <p>19 A I do not know at this point. I do --</p> <p>20 psychotropic medication, for example, Zoloft. So, it  21 could be a different kind of medication. And I base</p>	<p>44</p> <p>1 available?  2 A That's right.  3 Q Would you agree with me that within those  4 classes of medications there are I guess what you  5 might call brand name drugs and generic drugs?  6 A Uh huh. Correct.  7 Q Would you agree with me that generic  8 medications would be cheaper?  9 A That's correct.  10 Q Did you check the price of the generic  11 medication?  12 A No, I did not.  13 Q How did you determine the cost of a full  14 neuropsychological assessment?  15 A We had a quote here from a  16 neuropsychological psychologist.  17 Q Who was that?  18 A I don't have it in front of me. I'm  19 sorry.  20 Q Would you agree with me that different  21 neuropsychologists might charge different sums for an</p>
<p>43</p> <p>1 this on Dr. Cohen's report that he needs that.  2 Q I understand.  3 You would agree with me, though, that  4 Dr. Cohen is not an M.D.?  5 A Right.  6 Q And you would agree with me that an M.D.  7 would have to prescribe Zoloft or any other  8 psychotropic medication?  9 A I don't know. I mean, you should discuss  10 that with Dr. Cohen.  11 Q Would you agree with me that because  12 you've done obviously some research into what the cost  13 of this treatment would be --  14 A Yeah.  15 Q -- would --  16 A Yeah, I have this from the Web site called  17 Popular Prescription Drugs-dot-COM.  18 Q Would you agree with me that Zoloft is but  19 one example of a number of different classes of --  20 A That's right.  21 Q -- psychotropic medications which would be</p>	<p>45</p> <p>1 assessment?  2 A Could be.  3 Q Do you think it would have been prudent to  4 check the cost for such an assessment with more than  5 one provider?  6 A Sure. Yeah.  7 Q And the follow-up treatment for three  8 years which you've reduced to present value of \$609,  9 is that the course of follow-up psychotherapy that  10 you're referring to?  11 A No. That -- let me see.  12 Yeah. He needs psychotherapy and  13 cognitive retraining once a week for a year, yes.  14 Q What is the follow-up treatment for three  15 years that you're referring to?  16 A Well, I just -- what I did is I did that  17 12 times 80 and discounted that to present value. And  18 I do not have a price for the other expenses.  19 So, therefore -- and the psychotropic  20 medication is calculated over three years. So,  21 therefore, this is, you know, three years.</p>

12 (Pages 42 to 45)

GORE BROTHERS Reporting & Video Co., Inc.  
410-837-3027Towson Reporting Company  
410-828-4148